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IDAHO PUBLIC
UTILITIES COMMISSION

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)
APPLICATION OF ROCKY MOUNTAIN)
POWER FOR AUTHORITY TO)
INCREASE SCHEDULES 191 –)
CUSTOEMR EFFICIENCY SERVICES)
RATE)
)

CASE NO. PAC-E-16-02

PETITION TO INTERVENE OF THE
IDAHO CONSERVATION LEAGUE

COMES NOW the Idaho Conservation League (“ICL”) and hereby requests leave to intervene in the above captioned matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.01.071-073. As discussed below, ICL has direct and substantial interests in these proceedings, and therefore should be granted intervention.

1. The name of this intervenor is:

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Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the name and address above. In the interest of conserving natural resources and reducing the costs to all parties, please provide hard copies of pleadings, testimony, and briefs only. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IPUC Rules 31.01.01.063.02-03.

2. Idaho Conservation League claims a direct and substantial interest in this proceeding arising from the impact to its members served by Rocky Mountain Power and to its long-term role advocating for public values. As Idaho's largest state-based conservation organization, we

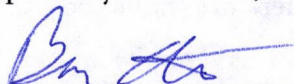
have approximately ____ members who are residential customers of Rocky Mountain Power. ICL and our members have an interest in expanding of energy efficiency and conservation in Idaho. As the only potential intervenor in this proceeding advocating for investments, rate designs, and rate spreads specifically intended to fully incentivize energy efficiency and conservation, ICL brings a unique and valuable perspective to this proceeding. Because this Commission has directed all utilities to pursue all cost effective efficiency and conservation measures, ICL's intervention will not unduly broaden the issues in this proceeding.

3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL's intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. If necessary ICL may introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. ICL may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition.

DATED this 22nd day of 2016.

Respectfully submitted,



Benjamin J. Otto
Idaho Conservation League

CERTIFICATE OF SERVICE

I certify that on the 22nd day of January 2016, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following persons via the method noted:

Hand delivery:

Jean Jewell
Commission Secretary (Original and seven
copies provided)
Idaho Public Utilities Commission
427 W. Washington St.
Boise, ID 83702-5983

Electronic Mail:

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